

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
	:	
-against-	:	Docket No. 16-cr-371 (PKC)
	:	
JASON GALANIS, et al.,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that the defendant, Jason Galanis, through undersigned counsel, respectfully moves this Court to vacate his conviction “in the interests of justice,” pursuant to Federal Rule of Criminal Procedure 33(a). Vacatur of the conviction is necessary to permit Mr. Galanis to plead guilty to a “joint” plea agreement, originally offered to Mr. Galanis by the government on July 19, 2016, that would dispose of the charges both in the above-captioned matter (the “Wakpamni” matter) as well as in case number 15-cr-643 (the “Gerova” matter), which is also pending before Your Honor. The government has indicated that it **consents** to the relief sought in the instant motion.

Date: November 15, 2019

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